FILED

AUG 25 2008

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

8/21/08

IN THE UNITED STATES DISTRICT COURT
DISTRICT of DELAWARE

Kenneth Abraham (KA)   Case No 08-452 SLR
Petitioner
                              Demand or
        v.   Motion or Request for
Delaware Dept. of Corrections Trial by Jury-Petition Declaratory Judgment
D.O.C. et. al.   (and renewed Request for Counsel)

        Comes Now Petitioner, KA, who on This 21st day of August
2008, Moves This Honorable Court as follows:
        ① In accordance with Federal Rules CP #5) 38 and 39, 28 USC
§2201, and 10 Del C. §6508, which I have just received and reviewed,
I request a trial by jury in this case, a Petition for
Declaratory Judgment on These issues:
        a) whether facts alleged and to be proved not show
That The "GreenTree Program" violates provisions of US Constitution, as
claimed. b) whether facts alleged and to be proved show that
The "GreenTree Program" violates certain Delaware statutes, as
claimed c) whether the facts alleged and to be proved show
That the actual operation of said "GreenTree Program" is
detrimental or harmful to the health/welfare, (including
mental health) of its particpants.
        ② For The many reasons already explained in Petition, KA
requests appointment of counsel,

                            Respectfully Submitted,

                            KA

Over

Kenneth Abraham, SHU 18 BL 2, # 173040
Vaughn CC., 1181 Paddock Rd, Smyrna, DE 19977

Certificate of Service

I, Ken Abraham do certify that on this 25th day of August, 2008, I did place in the U.S. Mail a copy of this pleading (Request for jury trial - case 08-452) to the defendants at:

Attorney General
Carvel State Office, Bldg.
820 N. French Street, Wilmington, DE 19801

I/M   Ken Abraham

SBI# 173040   UNIT SHU3BL 2

JAMES T. VAUGHN CORRECTIONAL CENTER
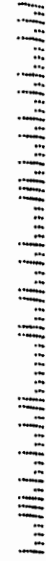
1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

Clerk - US District Court
US Court House   lockbox 18
844 N. King St.
Wilmington   Del.
19801-3570

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CA08-452 SCR

8/20/08

To: Peter Dalleo
Clerk - U.S. Dist. Ct.

From: Ken Abraham

re: Case 08-452 Declaratory Judgment case.
Abraham v. D.O.C. et al

Dear Mr. Dalleo,
        Enclosed are Original and Three (3) copies
of The Demand for Jury Trial and Renewed Request for
Counsel in This case! Also mailed to Attorney General
This date.
        Thank you for your attention to this.

                    Respectfully,

                    Kenneth Abraham
                    173040 SHU18 BL2
                    Vaughn CC, 1181 Paddock Rd
                    Smyrna, DE 19977

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